PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Engineered Polymer Solutions D.B.A. Valspar Coatings
202 Jacobs Avenue
Fort Wayne, Indiana 46851

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-9966-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: Expiration Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary paint manufacturing process.

Responsible Official:	Steve Erdahl, Vice President Industrial Division
Source Address:	202 Jacobs Avenue, Fort Wayne, Indiana, 46851
Mailing Address:	202 Jacobs Avenue, Fort Wayne, Indiana, 46851
SIC Code:	2851
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Fifty-two (52) storage tanks, listed as follows:

(1) Two (2) waste solvent recycle system storage tanks, constructed in 1981, listed as follows:

(A) One (1) 5000 gallon capacity waste tank, identified as TW1, using no controls; and

(B) One (1) 1200 gallon capacity settling tank, identified as TW2, using no controls;

(2) Two (2) reclaimed solvent storage tanks, constructed in 1981, listed as follows:

(A) One (1) reclaimed solvent storage tank, identified as T-RS, exhausting to vent S-4, with a maximum capacity of 1000 gallons, using no controls; and

(B) One (1) reclaimed solvent storage tank, identified as T-31, exhausting to vent V-5, with a maximum capacity of 3500 gallons, using no controls;

(3) Thirty-five (35) resin storage tanks, listed as follows:

(A) Twenty-one (21) tanks, constructed in 1981, exhausting to vent S-4, listed as follows:

(i) Three (3) tanks are identified as T1-T3 with a maximum capacity of 3,500 gallons each, using no controls;

(ii) Five (5) tanks are identified as T4-T8 with a maximum capacity of

10,000 gallons each, using no controls;

(iii) Two (2) tanks are identified as T9 and T10 with a maximum capacity of 3,400 gallons each, using no controls;

(iv) One (1) tank is identified as T11 with a maximum capacity of 3,384 gallons each, using no controls;

(v) Three (3) tanks are identified as T12-T14 with a maximum capacity of 2,234 gallons each, using no controls;

(vi) Four (4) tanks are identified as T15-T18 with a maximum capacity of 5,500 gallons each, using no controls; and

(vii) Three (3) tanks, identified as T19-T21, with a maximum capacity of 6,000 gallons each, using no controls;

(B) Three (3) tanks, constructed in 1981, identified as tanks T28-T30, exhausting to vent V-5, with a maximum capacity of 3,500 gallons, using no controls;

(C) Two (2) tanks, constructed in 1981, identified as tanks T32 & T33, exhausting to vent V-6, with a maximum capacity of 2,400 gallons, using no controls;

(D) Two (2) tanks, constructed in 1981, identified as tanks T34 & T35, exhausting to vent V-6, with a maximum capacity of 4,000 gallons, using no controls;

(E) Four (4) tanks, constructed in 1981, identified as tanks T36-T39, exhausting to vent V-7, with a maximum capacity of 4,000 gallons, using no controls; and

(F) One (1) combustible resin storage tank, constructed in 1996, identified as tank T41, with a maximum capacity of 6,000 gallons, using no controls;

(G) One (1) Non-VOC HAP resin storage tank, constructed in 1995, identified as tanks T42, with a maximum capacity of 6,000 gallons, using no controls; and

(H) One (1) Non-VOC HAP resin storage tank, identified as tank T43, with a maximum capacity of 6,000 gallons, using no controls; [NOT IN SERVICE]

(4) One (1) wastewater tank, constructed in 1981, identified as tank T40 with a maximum capacity of 6,000 gallons and exhausting to vent V-7, using no controls;

(5) Twelve (12) solvent storage tanks, constructed in 1981, listed as follows:

(A) Eight (8) tanks, identified as T-A, T-B, T-E, T-F, T-I, T-J, T-K, and T-L, exhausting to stacks A, B, E, F, I, J, K, and L, each with a maximum capacity of 3,000 gallons, using no controls;

(B) Two (2) tanks, identified as T-C and T-D, exhausting to stacks C and D, each with a maximum capacity of 10,000 gallons, using no controls; and

(C) Two (2) tanks, identified as T-G and T-H, exhausting to stacks G and H, each with a maximum capacity of 4,500 gallons, using no controls;

(b) Fifteen (15) premix tanks, constructed in 1981, identified as PM-A through PM-M, PM-O and PM-P, with particulate emissions controlled by a baghouse;

(c) Twenty (20) portable mixers, listed as follows:

(1) Two (2) portable mixers, constructed in 1997, identified as P13 & P14, with particulate emissions controlled by a baghouse;

(2) Twelve (12) portable mixers, constructed in 1981, identified as P1-P11 and CP1 (P11 and CP1 were constructed in 1997), using no controls;

(3) Five (5) portable mixers, constructed in 1999, identified as SBB-1, SBB-2, SBB-3, SBB-4 and SBB-5, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput for each mixer of ninety-eight and four-tenths pounds per hour (98.4 lb/hr), using no controls; and

(4) One (1) portable mixer, constructed in 1999, identified as SBB-6, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput of 293.3 pounds per hour, using no controls;

(d) Eight (8) mills, constructed in 1981, identified as M1-M4 and M6-M9 (M9 was constructed in 1997.), using no controls ;

(e) Forty (40) let down tanks, constructed in 1981, identified as L1-L18, L20 & L21, and L23-L42, using no controls;

(f) Two (2) clear manufacturing tanks, constructed in 1981, identified as C1 and C2, using no controls;

(g) One (1) still identified as ST-1, constructed in 1981, using no controls;

(h) One (1) CB Mills tote washer, constructed in 1981, identified as CB, using no controls;

(i) One (1) 20 horsepower horizontal bead mill, constructed in 1997, identified as M10, using no controls;

(j) Seven (7) dispersion mixers, listed as follows:

(1) Two (2) 15 horsepower dispersion mixers, constructed in 1997, identified as DM-1 and DM-3 with particulate emissions controlled by baghouse CE-1;

(2) One (1) 25 horsepower dispersion mixer, constructed in 1997, identified as DM-2, using no controls; and

(3) Four (4) 5 horsepower dispersion mixers, constructed in 1998, identified as DM-4, DM-5, DM-6 and DM-7, exhausting to wall vents designated V-1 and V-2 and a stack designated S-4, each with a maximum liquid paint input of 100 pounds per hour total, using no controls **(Exempt)**;

(k) One (1) ten liter basket mill, constructed in 1997, identified as BM-1, using no controls;

(l) One (1) NU-PAK automatic paint filler line, constructed in 1997, identified as AFL-1, capable of filling either 5 gallon containers or 55 gallon drums with finished paint product,

using no controls; and

(m) One (1) Bentone mixing tank, constructed in 1999, identified as B1, exhausting through a stack identified as S-3, with a maximum throughput of fifteen hundred and twenty pounds per hour (1,520 lb/hr), using no controls.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Two (2) natural gas fired boilers [326 IAC 6-2-3]:

(1) One (1) natural gas fired boiler, identified as B1, constructed in 1981, with a heat input capacity of ten million British thermal units per hour (10 MMBtu/hr); and

(2) One (1) natural gas fired boiler, identified as B2, constructed before June 8, 1972, with a heat input capacity of one and twenty five hundredths million British thermal units per hour (1.25 MMBtu/hr);

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22); and

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on

or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(e) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(f) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(g) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(h) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]

(i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4.

Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a).

For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose

of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee requires certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR Part 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the

Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the

continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAM approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of

reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter.

Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.

(c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports, and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: **Paint Manufacturing Process**

(a) Fifty-two (52) storage tanks, listed as follows:

(1) Two (2) waste solvent recycle system storage tanks, constructed in 1981, listed as follows:

(A) One (1) 5000 gallon capacity waste tank, identified as TW1, using no controls; and

(B) One (1) 1200 gallon capacity settling tank, identified as TW2, using no controls;

(2) Two (2) reclaimed solvent storage tanks, constructed in 1981, listed as follows:

(A) One (1) reclaimed solvent storage tank, identified as T-RS, exhausting to vent S-4, with a maximum capacity of 1000 gallons, using no controls; and

(B) One (1) reclaimed solvent storage tank, identified as T-31, exhausting to vent V-5, with a maximum capacity of 3500 gallons, using no controls;

(3) Thirty-five (35) resin storage tanks, listed as follows:

(A) Twenty-one (21) tanks, constructed in 1981, exhausting to vent S-4, listed as follows:

(i) Three (3) tanks are identified as T1-T3 with a maximum capacity of 3,500 gallons each, using no controls;

(ii) Five (5) tanks are identified as T4-T8 with a maximum capacity of 10,000 gallons each, using no controls;

(iii) Two (2) tanks are identified as T9 and T10 with a maximum capacity of 3,400 gallons each, using no controls;

(iv) One (1) tank is identified as T11 with a maximum capacity of 3,384 gallons each, using no controls;

(v) Three (3) tanks are identified as T12-T14 with a maximum capacity of 2,234 gallons each, using no controls;

(vi) Four (4) tanks are identified as T15-T18 with a maximum capacity of 5,500 gallons each, using no controls; and

(vii) Three (3) tanks, identified as T19-T21, with a maximum capacity of 6,000 gallons each, using no controls;

(B) Three (3) tanks, constructed in 1981, identified as tanks T28-T30, exhausting to vent V-5, with a maximum capacity of 3,500 gallons, using no controls;

(C) Two (2) tanks, constructed in 1981, identified as tanks T32 & T33, exhausting to vent V-6, with a maximum capacity of 2,400 gallons, using no controls;

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Facility Description [326 IAC 2-7-5(15)]: **Paint Manufacturing Process *(continued)***

[(a)(3) cont.]

(D) Two (2) tanks, constructed in 1981, identified as tanks T34 & T35, exhausting to vent V-6, with a maximum capacity of 4,000 gallons, using no controls;

(E) Four (4) tanks, constructed in 1981, identified as tanks T36-T39, exhausting to vent V-7, with a maximum capacity of 4,000 gallons, using no controls; and

(F) One (1) combustible resin storage tank, constructed in 1996, identified as tank T41, with a maximum capacity of 6,000 gallons, using no controls;

(G) One (1) Non-VOC HAP resin storage tank, constructed in 1995, identified as tanks T42, with a maximum capacity of 6,000 gallons, using no controls; and

(H) One (1) Non-VOC HAP resin storage tank, identified as tank T43, with a maximum capacity of 6,000 gallons, using no controls; [NOT IN SERVICE]

(4) One (1) wastewater tank, constructed in 1981, identified as tank T40 with a maximum capacity of 6,000 gallons and exhausting to vent V-7, using no controls;

(5) Twelve (12) solvent storage tanks, constructed in 1981, listed as follows:

(A) Eight (8) tanks, identified as T-A, T-B, T-E, T-F, T-I, T-J, T-K, and T-L, exhausting to stacks A, B, E, F, I, J, K, and L, each with a maximum capacity of 3,000 gallons, using no controls;

(B) Two (2) tanks, identified as T-C and T-D, exhausting to stacks C and D, each with a maximum capacity of 10,000 gallons, using no controls; and

(C) Two (2) tanks, identified as T-G and T-H, exhausting to stacks G and H, each with a maximum capacity of 4,500 gallons, using no controls;

(b) Fifteen (15) premix tanks, constructed in 1981, identified as PM-A through PM-M, PM-O and PM-P, with particulate emissions controlled by a baghouse;

(c) Twenty (20) portable mixers, listed as follows:

(1) Two (2) portable mixers, constructed in 1997, identified as P13 & P14, with particulate emissions controlled by a baghouse;

(2) Twelve (12) portable mixers, constructed in 1981, identified as P1-P11 and CP1 (P11 and CP1 were constructed in 1997), using no controls;

(3) Five (5) portable mixers, constructed in 1999, identified as SBB-1, SBB-2, SBB-3, SBB-4 and SBB-5, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput for each mixer of ninety-eight and four-tenths pounds per hour (98.4 lb/hr), using no controls; and

(4) One (1) portable mixer, constructed in 1999, identified as SBB-6, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput of 293.3 pounds per hour, using no controls;

(d) Eight (8) mills, constructed in 1981, identified as M1-M4 and M6-M9 (M9 was constructed in 1997.), using no controls ;

Facility Description [326 IAC 2-7-5(15)]: **Paint Manufacturing Process *(continued)***

(e) Forty (40) let down tanks, constructed in 1981, identified as L1-L18, L20 & L21, and L23-L42, using no controls;

(f) Two (2) clear manufacturing tanks, constructed in 1981, identified as C1 and C2, using no controls;

(g) One (1) still identified as ST-1, constructed in 1981, using no controls;

(h) One (1) CB Mills tote washer, constructed in 1981, identified as CB, using no controls;.

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter

Pursuant to 326 IAC 6-3-2, the PM emissions from the paint manufacturing process shall not exceed the allowable particulate matter (PM) emission rate of 4.28 pounds per hour based on a process weight rate of 0.68 tons per hour.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for portable mixers P13 and P14 and baghouse CE-1. The Permittee submitted a PMP on July 20, 1998 that has been verified to fulfill this requirement.

Compliance Determination Requirement

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter

Pursuant to 326 6-3 (Process Operations), and in order to comply with D.1.1, the baghouse (CE-1) shall be in operation at all times when the either of the two (2) portable mixers, P13 or P14, are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse (CE-1) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month

and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the portable mixing process, at least once weekly when either of the two (2) portable mixers, P13 or P14, are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the portable mixing operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: **Paint Fill Line**

(a) One (1) 20 horsepower horizontal bead mill, constructed in 1997, identified as M10, using no controls;

(b) Three (3) dispersion mixers constructed in 1997:

(1) Two (2) 15 horsepower dispersion mixers, identified as DM-1 and DM-3 with particulate emissions controlled by a baghouse identified as CE-1; and

(2) One (1) 25 horsepower dispersion mixer identified as DM-2;

(c) One (1) ten liter basket mill, constructed in 1997, identified as BM-1, using no controls;

(d) One (1) NU-PAK automatic paint filler line, constructed in 1997, identified as AFL-1, capable of filling either 5 gallon containers or 55 gallon drums with finished paint product, using no controls.

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter Limitation

Pursuant to 326 IAC 6-3-2, the PM emissions from these additions to the paint manufacturing process shall not exceed the allowable particulate matter (PM) emission rate of 2.0 pounds per hour based on a process weight rate of 0.44 tons per hour.

D.2.2 BACT Condition

Pursuant to 326 IAC 8-1-6 and CP 003-8552-00018 issued on August 4, 1997, the Best Available Control Technology (BACT) for the paint filler line identified as AFL-1 shall be no VOC control with good operating and preventive maintenance program.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for dispersion mixers DM1 and DM3 and baghouse CE-1. The Permittee submitted a PMP on July 20, 1998 that has been verified to fulfill this requirement.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter Limitation

Pursuant to 326 6-3 (Process Operations), and in order to comply with D.2.1, the existing baghouse (CE-1) shall be in operation at all times when either of the two (2) dispersion mixers, DM1 or DM3, are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse (CE-1) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the dispersion mixing process, at least once weekly when either of the two (2) dispersion mixers, DM1 or DM3, are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.8 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the dispersion mixing operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of

discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: **Bentone Mixing Tank**

(a) One (1) Bentone mixing tank, constructed in 1999, identified as B1, exhausting through a stack identified as S-3, with a maximum throughput of fifteen hundred and twenty pounds per hour (1,520 lb/hr), using no controls;

(b) Five (5) portable mixers, constructed in 1998, identified as SBB-1, SBB-2, SBB-3, SBB-4 and SBB-5, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput for each mixer of ninety-eight and four-tenths pounds per hour (98.4 lb/hr), using no controls; and

(c) One (1) portable mixer, identified as SBB-6, constructed in 1999, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput of 293.3 pounds per hour, using no controls.

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compound [326 IAC 8-1-6]

Pursuant to MSM 003-10794-00018, issued on August 2, 1999, the input VOCs for the Bentone Mixing tank is limited to less than twenty-five (25) tons per twelve (12) consecutive months in order to keep the VOC emissions below the twenty five (25) tons per year major source threshold. Compliance with this limits renders the requirements of 326 IAC 8-1-6 not applicable.

D.3.2 Hazardous Air Pollutants [326 IAC 2-4.1-1]

(a) Pursuant to MSM 003-10794-00018, issued on August 2, 1999, during the first twelve (12) months of operation, the input HAP usage for the Bentone mixing tank shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 9.996 total tons per year for any single HAP and 24.996 total tons per year for any combination of HAPs, each divided by twelve (12) months, which equals 0.833 tons per month for any single HAP and 2.083 tons per month for any combination of HAPs.

(b) Following the first twelve (12) months of operation, the input of any single HAP for the Bentone Mixing tank is limited to less than ten (10) tons per twelve (12) consecutive months, based on a 12-month rolling average, in order to keep the single HAP emissions below the ten (10) tons per year major source threshold. The input of any combination of HAPs for the Bentone Mixing tank is limited to less than twenty-five (25) tons per twelve (12) consecutive months, based on a 12-month rolling average, in order to keep the total HAP emissions below the twenty five (25) tons per year major source threshold.

Compliance with these limits renders the requirements of 326 IAC 2-4.1-1 not applicable.

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to MSM 003-10794-00018, issued on August 2, 1999, the PM from the Bentone mixing tank shall not exceed 3.40 pounds per hour. This emission rate is established as E in the following formula and represents a process weight rate of 0.76 tons per hour:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Bentone mixing tank B1 and portable mixers SBB1, SBB2, SBB3, SBB4, SBB5 and SBB6.

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.3.7 VOC and HAP Emissions

Compliance with Conditions D.3.1 and D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no applicable Compliance Monitoring Requirements for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the input VOC and input HAP usage limits established in Conditions D.3.1 and D.3.2.

(1) The amount and VOC/HAP content of each raw material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of input VOC/HAP used. Input VOC/HAP usage records shall differentiate between those added to the Bentone mixing tank and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total input VOC/HAP usage for each month; and

(5) The weight of VOCs/HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1 and D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does

require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: **Natural Gas Fired Boilers**

Two (2) natural gas boilers:

(a) One (1) natural gas boiler, identified as B1, constructed in 1981, with a heat input capacity of ten million British thermal units per hour (10 MMBtu/hr); and

(b) One (1) natural gas boiler, identified as B2, constructed before June 8, 1972, with a heat input capacity of one and twenty five hundredths million British thermal units per hour (1.25 MMBtu/hr).

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating):

(a) Since B1 was constructed after June 8, 1972 but before September 21, 1983, the PM emissions from this boiler shall in no case exceed 0.6 lb/MMBtu heat input; and

(b) Since B2 was constructed before June 8, 1972, the PM emissions from this boiler shall in no case exceed 0.8 lb/MMBtu heat input.

Compliance Determination Requirement

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no applicable Compliance Monitoring Requirements for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.3 Reporting Requirements

The natural gas fired boiler certification shall be submitted semi-annually to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Engineered Polymer Solutions D.B.A. Valspar Coatings
Source Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Mailing Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Part 70 Permit No.: T003-9966-00018

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Engineered Polymer Solutions D.B.A. Valspar Coatings
Source Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Mailing Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Part 70 Permit No.: T003-9966-00018

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Data Section); and
- C The Permittee must submit notice by mail or facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: EPS d.b.a. Valspar Coatings
Source Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Mailing Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Part 70 Permit No.: T003-9966-00018

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: EPS d.b.a. Valspar Coatings
Source Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Mailing Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Part 70 Permit No.: T003-9966-00018
Facility: Bentone Mixing Tank
Parameter: Input Single HAP
Limit: 0.833 tons per month (for the first 12 months only);
9.996 tons per year (tpy)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: EPS d.b.a. Valspar Coatings
Source Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Mailing Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Part 70 Permit No.: T003-9966-00018
Facility: Bentone Mixing Tank
Parameter: Input Combination HAPs
Limit: 2.083 tons per month (for the first 12 months only);
24.996 tons per year (tpy)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: EPS d.b.a. Valspar Coatings
Source Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Mailing Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Part 70 Permit No.: T003-9966-00018
Facility: Bentone Mixing Tank
Parameter: Input VOC
Limit: 25.0 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Engineered Polymer Solutions D.B.A. Valspar Coatings
Source Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Mailing Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Part 70 Permit No.: T003-9966-00018

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Engineered Polymer Solutions DBA Valspar Coatings
Source Location:	202 Jacobs Avenue, Fort Wayne, Indiana 46851
County:	Allen
SIC Code:	2851
Operation Permit No.:	T003-9966-00018
Permit Reviewer:	Kimberly Cottrell

On October 17, 2000, the Office of Air Management (OAM) had a notice published in the Allen County Public Library, 900 West Webster Street, P.O. Box 2270, Fort Wayne, Indiana, stating that Engineered Polymer Solutions DBA Valspar Coatings had applied for a Part 70 Operating Permit to operate a facility for the manufacture of industrial coatings. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comment 1: Steve Scales is no longer the contact person for this facility. The new contact person is Allen M. Stegman, the Corporate Environmental Engineering Manager.

Response to Comment 1: The change has been noted.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

COVER PAGE

1. The expiration has been added to the signature box. The expiration is exactly 5 years after the issuance date. For example, if the permit was issued December 13, 1996, the expiration date would be December 13, 2001.

Operation Permit No.: T003-9966-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: **Expiration Date:**

SECTION A

2. In Condition A.1, General Information, the rule cite for the definition of a major source in 326 IAC 2-7 was added.

   The responsible official section can be a name or a title; therefore, Steve Erdahl's title has been added.

We are no longer going to include the phone number of the contact person.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] **[326 IAC 2-7-1(22)]**

The Permittee owns and operates a stationary paint manufacturing process.

Responsible Official:	Steve Erdahl**, Vice President Industrial Division**
Source Address:	202 Jacobs Avenue, Fort Wayne, Indiana, 46851
Mailing Address:	202 Jacobs Avenue, Fort Wayne, Indiana, 46851
~~Phone Number:~~	~~(219) 484-9011 (Steve Scales)~~
SIC Code:	2851
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD; Major Source, Section 112 of the Clean Air Act

3. For Condition A.2, Emission Units and Pollution Control Equipment Summary, we are now requesting the date of construction be added to the facility description.

Also, in paragraph (a) the total number of storage tanks was incorrect. This has been corrected.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) ~~Forty-nine (49)~~ **Fifty-two (52)** storage tanks, listed as follows:

(1) Two (2) waste solvent recycle system storage tanks, **constructed in 1981,** listed as follows:

(A) One (1) 5000 gallon capacity waste tank, identified as TW1, using no controls; and

(B) One (1) 1200 gallon capacity settling tank, identified as TW2, using no controls;

(2) Two (2) reclaimed solvent storage tanks, **constructed in 1981,** listed as follows:

(A) One (1) reclaimed solvent storage tank, identified as T-RS, exhausting to vent S-4, with a maximum capacity of 1000 gallons, using no controls; and

(B) One (1) reclaimed solvent storage tank, identified as T-31, exhausting to vent V-5, with a maximum capacity of 3500 gallons, using no controls;

(3) Thirty-five (35) resin storage tanks, listed as follows:

(A) Twenty-one (21) tanks, **constructed in 1981,** exhausting to vent S-4, listed as follows:

(i) Three (3) tanks are identified as T1-T3 with a maximum capacity of 3,500 gallons each, using no controls;

(ii) Five (5) tanks are identified as T4-T8 with a maximum capacity of

10,000 gallons each, using no controls;

(iii) Two (2) tanks are identified as T9 and T10 with a maximum capacity of 3,400 gallons each, using no controls;

(iv) One (1) tank is identified as T11 with a maximum capacity of 3,384 gallons each, using no controls;

(v) Three (3) tanks are identified as T12-T14 with a maximum capacity of 2,234 gallons each, using no controls;

(vi) Four (4) tanks are identified as T15-T18 with a maximum capacity of 5,500 gallons each, using no controls; and

(vii) Three (3) tanks, identified as T19-T21, with a maximum capacity of 6,000 gallons each, using no controls;

(B) Three (3) tanks, **constructed in 1981,** identified as tanks T28-T30, exhausting to vent V-5, with a maximum capacity of 3,500 gallons, using no controls;

(C) Two (2) tanks, **constructed in 1981,** identified as tanks T32 & T33, exhausting to vent V-6, with a maximum capacity of 2,400 gallons, using no controls;

(D) Two (2) tanks, **constructed in 1981,** identified as tanks T34 & T35, exhausting to vent V-6, with a maximum capacity of 4,000 gallons, using no controls;

(E) Four (4) tanks, **constructed in 1981,** identified as tanks T36-T39, exhausting to vent V-7, with a maximum capacity of 4,000 gallons, using no controls; ~~and~~

(F) ~~Three (3)~~ **One (1) combustible** resin storage tank~~s~~, **constructed in 1996,** identified as ~~tanks T41-T43~~ **tank T41** with a maximum capacity of 6,000 gallons, using no controls;

(G) One (1) Non-VOC HAP resin storage tank, constructed in 1995, identified as tanks T42 with a maximum capacity of 6,000 gallons, using no controls; and

(H) One (1) Non-VOC HAP resin storage tank, identified as tank T43 with a maximum capacity of 6,000 gallons, using no controls; [NOT IN SERVICE]

(4) One (1) wastewater tank, **constructed in 1981,** identified as tank T40 with a maximum capacity of 6,000 gallons and exhausting to vent V-7, using no controls;

(5) Twelve (12) solvent storage tanks, **constructed in 1981,** listed as follows:

(A) Eight (8) tanks, identified as T-A, T-B, T-E, T-F, T-I, T-J, T-K, and T-L, exhausting to stacks A, B, E, F, I, J, K, and L, each with a maximum capacity of 3,000 gallons, using no controls;

(B) Two (2) tanks, identified as T-C and T-D, exhausting to stacks C and D, each with a maximum capacity of 10,000 gallons, using no controls; and

(C) Two (2) tanks, identified as T-G and T-H, exhausting to stacks G and H, each with a maximum capacity of 4,500 gallons, using no controls;

(b) Fifteen (15) premix tanks, **constructed in 1981,** identified as PM-A through PM-M, PM-O and PM-P, with particulate emissions controlled by a baghouse;

(c) Twenty (20) portable mixers, listed as follows:

(1) Two (2) portable mixers**, constructed in 1997,** identified as P13 & P14, with particulate emissions controlled by a baghouse;

(2) Twelve (12) portable mixers, **constructed in 1981,** identified as P1-P11 and CP1 **(P11 and CP1 were constructed in 1997)**, using no controls;

(3) Five (5) portable mixers, **constructed in 1999,** identified as SBB-1, SBB-2, SBB-3, SBB-4 and SBB-5, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput for each mixer of ninety-eight and four-tenths pounds per hour (98.4 lb/hr), using no controls; and

(4) One (1) portable mixer, **constructed in 1999,** identified as SBB-6, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput of 293.3 pounds per hour, using no controls;

(d) Eight (8) mills, **constructed in 1981,** identified as M1-M4 and M6-M9 **(M9 was constructed in 1997)**, using no controls ;

(e) Forty (40) let down tanks, **constructed in 1981,** identified as L1-L18, L20 & L21, and L23-L42, using no controls;

(6) Two (2) clear manufacturing tanks, **constructed in 1981,** identified as C1 and C2, using no controls;

(g) One (1) still identified as ST-1, **constructed in 1981,** using no controls;

(h) One (1) CB Mills tote washer, **constructed in 1981,** identified as CB, using no controls;

(i) One (1) 20 horsepower horizontal bead mill, **constructed in 1997,** identified as M10, using no controls;

(j) Seven (7) dispersion mixers, listed as follows:

(1) Two (2) 15 horsepower dispersion mixers, **constructed in 1997,** identified as DM-1 and DM-3 with particulate emissions controlled by baghouse CE-1;

(2) One (1) 25 horsepower dispersion mixer, **constructed in 1997,** identified as DM-2, using no controls; and

(3) Four (4) 5 horsepower dispersion mixers, **constructed in 1998,** identified as DM-4, DM-5, DM-6 and DM-7, exhausting to wall vents designated V-1 and V-2 and a stack designated S-4, each with a maximum liquid paint input of 100 pounds per hour total, using no controls **(Exempt)**;

(k) One (1) ten liter basket mill, **constructed in 1997,** identified as BM-1, using no controls;

(l) One (1) NU-PAK automatic paint filler line, **constructed in 1997,** identified as AFL-1, capable of filling either 5 gallon containers or 55 gallon drums with finished paint product,

using no controls; and

(m) One (1) Bentone mixing tank, **constructed in 1999,** identified as B1, exhausting through a stack identified as S-3, with a maximum throughput of fifteen hundred and twenty pounds per hour (1,520 lb/hr), using no controls.

SECTION B

4. Condition B.1, Permit No Defense, has been deleted. This is not in IC13, but the general authority for this in 326 IAC 2-7-15; therefore, most of this language has been added to B.14, Permit Shield. B.14 provides for when the possession of a permit does provide a defense and provides that it is only for those requirements in existence at the time of permit issuance. **All other B conditions have been re-numbered as a result of this change.**

~~B.1 Permit No Defense [IC 13]~~

~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~

~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield.~~

5. In Condition B.3, Permit Term, (Now B.2) language has been added to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be five (5) years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

~~B.3~~ **B.2** Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the ~~effective~~ **original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

6. Condition B.8, Duty to Supplement and Provide Information, (Now B.7) has been reworded to match the language in the rule.

~~B.8~~ **B.7** Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] **[326 IAC 2-7-6(6)]**

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that

IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). **Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]**

(c) ~~Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit.~~ The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. ~~If requested by IDEM, OAM, or the U.S. EPA, to~~ **When** furnish**ing** copies of requested records directly to U. S. EPA, ~~then~~ the ~~Permittee must furnish record directly to the U. S. EPA. The~~ Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

7. For Condition B.9, Compliance with Permit Conditions, (Now B.8) a subsection (c) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures.

~~B.9~~ **B.8** Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

8. In Condition B.10, Certification, (Now B.9) subsection (b) has been modified to clarify when a certification is needed.

~~B.10~~ **B.9** Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.

9. In Condition B.11, Annual Compliance Certification, (Now B.10) subsection (a) has been revised to clarify that the initial certification is from the date of issuance until Dec. 31, and subsection (c) has been revised so that it matches the language in the rule.

~~B.11~~ **B.10** Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit,

including emission limitations, standards, or work practices. The **initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** certification**s** shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining **the** compliance **status** of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

10. In Condition B.12, Preventive Maintenance Plan, (Now B.11) subsection (d) containing the record keeping requirements have been added.

~~B.12~~ **B.12** Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection

schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond ~~it's~~ **the Permittee's** control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

11. In Condition B.13, Emergency Provisions, (Now B.12) a reference to the Emergency Occurrence Report Form has been added to subsection (b), paragraph (5). The emergency form is for emergencies only, and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report.

In subsection (d), part of the first sentence has been deleted since this is a Title V source and the malfunction rule has been superceded by the emergency rule.

In subsection (f), "compliance" has been changed to "accordance".

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** ~~notice~~, either ~~in writing~~ **by mail** or facsimile~~, of the emergency~~ to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall

constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

12. In Condition B.14, Permit Shield, (Now B.13) some of the language from B.1, Permit No Defense, has been added. In subsection (d), some of the language has been removed because it is unnecessary and would be contradictory to our procedures for revising operating permits. Construction permit terms are covered in the definition of applicable requirements.

~~B.14~~ **B.13** Permit Shield [326 IAC 2-7-15] **[326 IAC 2-7-20] [326 IAC 2-7-12]**

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. **The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit,~~ IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

~~(e)~~**(d)** No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

~~(f)~~**(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(g)~~**(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(h)~~**(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]

~~(i)~~**(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

12. In Condition B.16, Deviations from Permit Requirements and Conditions, (Now B.15) IDEM, OAM is no longer requiring sources to report deviations in 10 days. Now they will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since we relaxed the 10 day notification to a quarterly report.

~~B.16~~ **B.15** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation~~ **using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent.** ~~except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~ **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in**

the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) ~~An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3)~~ Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

13. In Condition B.19, Permit Amendment or Modification, (Now B.18) 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official; therefore, this condition has been revised to clarify this requirement. This change was also requested by US EPA.

~~B.19~~ **B.18** Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule~~.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

14. In Condition B.21, Operational Flexibility, (Now B.20), subsection (b) has been reorganized such that paragraph (1) was removed so the condition would be consistent with the language in the rule.

~~B.21~~ **B.20** Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). ~~and the following additional conditions:~~

~~(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

~~(2)~~ For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

~~(A)~~**(1)** A brief description of the change within the source;

~~(B)~~**(2)** The date on which the change will occur;

~~(C)~~**(3)** Any change in emissions; and

~~(D)~~**(4)** Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

15. In Condition B.22, Source Modification Requirement, (Now B.21) 326 IAC 2 has been added to make the condition more complete. The language "applicable provisions" has been removed because it is unnecessary.

~~B.22~~ **B.21** Source Modification Requirement [326 IAC 2] [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by ~~the applicable provisions of~~ **326 IAC 2 and** 326 IAC 2-7-10.5.

16. In Condition B.23, Inspection and Entry (Now B.22) "At reasonable times" has been deleted because neither the rule nor the statute limit IDEM, OAM to "reasonable times".

~~B.23~~ **B.22** Inspection and Entry [326 IAC 2-7-6~~(2)~~] **[IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy~~, at reasonable times,~~ any records that must be kept under the conditions of this permit;

(c) Inspect,~~, at reasonable times,~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor~~, at reasonable times,~~ substances or parameters for the purpose of

assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. ~~[326 IAC 2-7-6(6)]~~

17. In Condition B.24, Transfer of Ownership or Operational Control, (Now B.23) 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official; therefore, this condition has been revised to clarify this requirement. This change was also requested by US EPA.

~~B.24~~ **B.23** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee ~~does not~~ require**s** ~~the~~ certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

18. In Condition B.25, Annual Fee Payment, (Now B.24) add the following rule cite to paragraph (a).

~~B.25~~ **B.24** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~If~~ **Pursuant 326 IAC 2-7-19(b), if** the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

19. In Condition C.6, Operation of Equipment, the following revisions were made to clarify the condition.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided **by statute, rule, or** in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all

times that the emission units vented to the control equipment are in operation.

20. In Condition C.7, Asbestos Abatement Projects, the rule cite in the title was changed to make it more generalized.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] ~~[40 CFR 61.140]~~ **[40 CFR Part 61, Subpart M]**

21. In subsection (c) of Condition C.8, Performance Testing, "within" has been changed to "not later than".

C.8 Performance Testing [326 IAC 3-6]

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM if the source submits to IDEM, OAM, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

22. In Condition C.10, Compliance Monitoring, there are times when compliance monitoring is required by a MACT that the source does not have to comply with yet. Therefore, language has been added to clarify that the permit will specify when CM doesn't have to start in 90 days. The same idea applies to new units, if the MACT doesn't apply yet, we would not expect the source to start compliance monitoring.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

~~All~~ **Unless otherwise specified in this permit, all** monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~Compliance~~ **Unless otherwise specified in the approval for the new emission unit(s), compliance** monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

23. In Condition C.11, Maintenance of Emission Monitoring Equipment, the language has been tweaked to clarify the intent.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less **often** than once **an** ~~(1)~~ hour until such time as the continuous monitor is back in operation.

24. In Condition C.12, Monitoring Methods, the following rule cites have been added.

C.12 Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63,** or other approved methods as specified in this permit.

25. In Condition C.13, Pressure Gauge Specifications, rule cites have been added. Language has been added for other instrument specifications.

C.13 Pressure Gauge **and Other Instrument** Specifications **[326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

(d) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAM approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

26. In Condition C.15, Risk Management Plan, if a source is subject to 40 CFR 68, they should have already submitted a Risk Management Plan.

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a)~~; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as

required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

27. In Condition C.16, Compliance Monitoring Plan - Failure to Take Response Steps, subsection (a), "of" was added.

In subsection (b), "shall" has been replaced with "may".

In subsection (c), paragraphs (2) and (3), the ";or" has been replaced with a period ".".

And in subsection (f), "(5%)" has been added to be consistent with the rest of the permit. Additional changes were made to subsection (f) due to frequently asked questions.

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole **of** information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps ~~shall~~ **may** constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied. ~~; or~~

(3) An automatic measurement was taken when the process was not operating. ~~; or~~

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) ~~If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.~~

~~(1)~~ At its discretion, IDEM may excuse **the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides** ~~such failure providing~~ adequate justification ~~is documented~~ and **documents that** such failures do not exceed five percent **(5%)** of the operating time in any quarter.

(~~2~~) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

28. In Condition C.17, Actions Related to Noncompliance Demonstrated by a Stack Test, "corrective actions" has been changed to "response actions" to be consistent with the rest of the permit.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ **response** actions. The Permittee shall submit a description of these ~~corrective~~ **response** actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the ~~corrective~~ **response** actions are being implemented.

29. In Condition C.18, Emission Statement, "estimated" was added to subsection (a), paragraphs (1) and (2) to be consistent with how 326 IAC 2-6 describes emissions.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]

[326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate **estimated** actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

30. In Condition C.19, General Record Keeping Requirements, "monitoring" was removed so that the condition will seem more generalized to all record keeping, "reports" was added to clarify that the source must keep copies of those as well. Subsections (b) and (c) have been removed because they were unnecessary since IDEM, OAM can specify this in Section D or elsewhere in the permit if those records are needed.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required ~~monitoring~~ data**, reports,** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) ~~Records of required monitoring information shall include, where applicable:~~

~~(1) The date, place, and time of sampling or measurements;~~

~~(2) The dates analyses were performed;~~

~~(3) The company or entity performing the analyses;~~

~~(4) The analytic techniques or methods used;~~

~~(5) The results of such analyses; and~~

~~(6) The operating conditions existing at the time of sampling or measurement.~~

~~(c) Support information shall include, where applicable:~~

~~(1) Copies of all reports required by this permit;~~

~~2. All original strip chart recordings for continuous monitoring instrumentation;~~

~~(3) All calibration and maintenance records;~~

~~(4) Records of preventive maintenance.~~

~~(d)~~ ~~All~~ **Unless otherwise specified in this permit, all** record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

31. In Condition C.20, General Reporting Requirements, subsection (a), the Semi-Annual Compliance Monitoring Report is now the Quarterly Deviation and Compliance Monitoring Report.

In subsection (d) IDEM, OAM has clarified that the report does need to be certified by the responsible official; this change is also reflected in all the D sections and the reporting forms. This change was also requested by US EPA.

References to the emergency report, subsections (e) and (f), have been removed since all this information is in Condition B.12, Emergency Provisions.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit ~~a~~ **the attached** Quarterly **Deviation and** Compliance Monitoring Report **or its equivalent**. Any deviation from ~~the~~ **permit** requirements, ~~and~~, the date(s) of each deviation**, the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and** Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) ~~All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

~~(g)~~ The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D

32. In Condition D.1.4, Particulate Matter (PM), language has been added to clarify which condition the baghouse is needed to show compliance.

D.1.4 Particulate Matter (PM)

Pursuant to 326 6-3 (Process Operations), **and in order to comply with D.1.1, the** baghouse (CE-1) shall be in operation at all times when the either of the two (2) portable mixers, P13 or P14, are in operation.

33. In subsection (e) of Condition D.1.5, Visible Emission Notations, language about failure to take response steps has been added. This will help clarify that not taking a response step will be considered a permit violation.

D.1.5 Visible Emissions Notations

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

34. In subsection (a) of Condition D.1.6, Parametric Monitoring, language about failure to take response steps has been added. This will help clarify that not taking a response step will be considered a permit violation.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the portable mixing process, at least once weekly when either of the two (2) portable mixers, P13 or P14, are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge **and Other Instrument** Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

35. In Condition D.1.8, Broken or Failed Bag Detection, language about failure to take response steps has been added. This will help clarify that not taking a response step will be considered a permit violation.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) **For multi-compartment units,** the affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions).** Within eight (8) **business** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) **business** hours of discovery of the failure and shall include a timetable for completion. ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the~~

~~requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~ **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

36. In Condition D.1.9, Record Keeping Requirements, subsection (b), paragraph (1), subparagraph (B) was confusing; therefore, it has been revised so that it just requires the source to record whether the cleaning cycle operation was normal. Paragraphs (2) through (7) have been deleted because they are undefined and may not even be necessary.

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle~~: frequency and differential pressure~~ **operation**.

(2) ~~Documentation of all response steps implemented, per event .~~

~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~

~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~

~~(5) Operator standard operating procedures (SOP).~~

~~(6) Manufacturer's specifications or its equivalent.~~

~~(7) Equipment "troubleshooting" contingency plan.~~

~~(8)~~ Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

37. In Condition D.2.5, Particulate Matter (PM), language has been added to clarify which condition the baghouse is needed to show compliance.

D.2.5 Particulate Matter (PM)

Pursuant to 326 6-3 (Process Operations), **and in order to comply with D.2.1,** the existing baghouse (CE-1) shall be in operation at all times when either of the two (2) dispersion mixers, DM1 or DM3, are in operation.

38. In subsection (e) of Condition D.2.6, Visible Emission Notations, language about failure to take response steps has been added. This will help clarify that not taking a response step will be considered a permit violation.

D.2.6 Visible Emissions Notations

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

39. In subsection (a) of Condition D.2.7, Parametric Monitoring, language about failure to take response steps has been added. This will help clarify that not taking a response step will be considered a permit violation.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the dispersion mixing process, at least once weekly when either of the two (2) dispersion mixers, DM1 or DM3, are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge **and Other Instrument** Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.;

40. In Condition D.2.9, Broken or Failed Bag Detection, language about failure to take response steps has been added. This will help clarify that not taking a response step will be considered a permit violation.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) **For multi-compartment units,** the affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions).** Within eight (8) **business** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) **business** hours of discovery of the failure and shall include a timetable for completion. ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the~~

~~requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~ **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

41. In Condition D.2.10, Record Keeping Requirements, subsection (b), paragraph (1), subparagraph (B) was confusing; therefore, it has been revised so that it just requires the source to record whether the cleaning cycle operation was normal. Paragraphs (2) through (7) have been deleted because they are undefined and may not even be necessary.

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle~~: frequency and differential pressure~~ **operation**.

(2) ~~Documentation of all response steps implemented, per event .~~

~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~

~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~

~~(5) Operator standard operating procedures (SOP).~~

~~(6) Manufacturer's specifications or its equivalent.~~

~~(7) Equipment "troubleshooting" contingency plan.~~

~~(8)~~ Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

42. In Condition D.3.6, Volatile Organic Compounds (VOC), the last sentence has been removed; it is unnecessary since the requirements are contained in Condition C.9, Compliance Requirements.

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. ~~IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

43. In Condition D.3.7, VOC and HAP Emissions, "most recent" has been removed for clarity when using the day option.

D.3.7 VOC and HAP Emissions

Compliance with Conditions D.3.1 and D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the ~~most recent~~ twelve (12) month period.

44. In Condition D.3.9, Reporting Requirements, these reports should be certified by the responsible official since Part 70 requires all reports to be certified. This change was also requested by US EPA.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 and D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. **The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

45. In Condition D.4.3, Reporting Requirements, these reports should be certified by the responsible official since Part 70 requires all reports to be certified. This change was also requested by US EPA.

D.4.3 Reporting Requirements

The natural gas fired boiler certification shall be submitted semi-annually to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. **The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

FORMS

46. Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the Compliance Branch, not the Compliance Data Section. We have negotiated with EPA on the reporting of emergencies. They agree to allow the 2 day notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official, therefore will comply with the Part 70 requirement to have all reports certified.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue

Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY~~/DEVIATION~~ OCCURRENCE REPORT

Source Name: Engineered Polymer Solutions D.B.A. Valspar Coatings
Source Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Mailing Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Part 70 Permit No.: T003-9966-00018

This form consists of 2 pages **Page 1 of 2**

~~Check either No. 1 or No.2~~

9 ~~1.~~ This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance **Data** Section); and
- C The Permittee must submit notice ~~in writing~~ **by mail** or ~~by~~ facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

~~**9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)~~

~~C The Permittee must submit notice in writing within ten (**10**) calendar days~~

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency~~/Deviation~~:
Describe the cause of the Emergency~~/Deviation~~:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency~~/Deviation~~ started:
Date/Time Emergency~~/Deviation~~ was corrected:

Was the facility being properly operated at the time of the emergency/~~deviation~~? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency~~/deviation~~:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

47. The monthly and quarterly reports will now need to be certified by the responsible official, therefore the last line in each of these reports have been changed from “A certification is not required for this report.” to “Attach a signed certification to complete this report.”. **This change affects three monthly reports.**

48. The Quarterly Compliance Monitoring Report, is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. We are no longer requiring sources to report deviations in ten days, therefore every source will need submit this report

quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

~~**PART 70 OPERATING PERMIT**~~
~~**QUARTERLY COMPLIANCE MONITORING REPORT**~~

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Engineered Polymer Solutions D.B.A. Valspar Coatings
Source Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Mailing Address: 202 Jacobs Avenue, Fort Wayne, Indiana 46851
Part 70 Permit No.: T003-9966-00018

Months: _____ **to** _____ **Year:** _____

~~This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".~~

~~**9** NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.~~

~~**9** THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.~~

~~**Compliance Monitoring Requirement**~~	~~**Number of Deviations**~~	~~**Date of each Deviation**~~

This report is an affirmation that the source has met all the ~~compliance monitoring~~ requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the ~~compliance monitoring~~ requirements, ~~and~~ the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~with the following exceptions:~~ Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. ~~This form can be supplemented by attaching the Emergency/Deviation Occurrence Report.~~ If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

~~**Compliance Monitoring**~~ **Permit Requirement** (specify permit condition #)

Date of ~~each~~ Deviation:	**Duration of Deviation:**

Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Engineered Polymer Solutions DBA Valspar Coatings
Source Location:	202 Jacobs Avenue, Fort Wayne, Indiana 46851
County:	Allen
SIC Code:	2851
Operation Permit No.:	T003-9966-00018
Permit Reviewer:	Kimberly Cottrell

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Engineered Polymer Solutions DBA Valspar Coatings relating to the manufacture of industrial coatings.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Forty-nine (49) storage tanks, listed as follows:

(1) Two (2) waste solvent recycle system storage tanks, listed as follows:

(A) One (1) 5000 gallon capacity waste tank, identified as TW1, using no controls; and

(B) One (1) 1200 gallon capacity settling tank, identified as TW2, using no controls;

(2) Two (2) reclaimed solvent storage tanks, listed as follows:

(A) One (1) reclaimed solvent storage tank, identified as T-RS, exhausting to vent S-4, with a maximum capacity of 1000 gallons, using no controls; and

(B) One (1) reclaimed solvent storage tank, identified as T-31, exhausting to vent V-5, with a maximum capacity of 3500 gallons, using no controls;

(3) Thirty-five (35) resin storage tanks, listed as follows:

(A) Twenty-one (21) tanks, exhausting to vent S-4, listed as follows:

(i) Three (3) tanks are identified as T1-T3 with a maximum capacity of 3,500 gallons each, using no controls;

(ii) Five (5) tanks are identified as T4-T8 with a maximum capacity of 10,000 gallons each, using no controls;

(iii) Two (2) tanks are identified as T9 and T10 with a maximum capacity of 3,400 gallons each, using no controls;

(iv) One (1) tank is identified as T11 with a maximum capacity of 3,384 gallons each, using no controls;

(v) Three (3) tanks are identified as T12-T14 with a maximum capacity of 2,234 gallons each, using no controls;

(vi) Four (4) tanks are identified as T15-T18 with a maximum capacity of 5,500 gallons each, using no controls; and

(vii) Three (3) tanks, identified as T19-T21, with a maximum capacity of 6,000 gallons each, using no controls;

(B) Three (3) tanks, identified as tanks T28-T30, exhausting to vent V-5, with a maximum capacity of 3,500 gallons, using no controls;

(D) Two (2) tanks, identified as tanks T32 & T33, exhausting to vent V-6, with a maximum capacity of 2,400 gallons, using no controls;

(E) Two (2) tanks, identified as tanks T34 & T35, exhausting to vent V-6, with a maximum capacity of 4,000 gallons, using no controls;

(F) Four (4) tanks, identified as tanks T36-T39, exhausting to vent V-7, with a maximum capacity of 4,000 gallons, using no controls; and

(G) Three (3) resin storage tanks, identified as tanks T41-T43 with a maximum capacity of 6,000 gallons, using no controls;

(4) One (1) wastewater tank, identified as tank T40 with a maximum capacity of 6,000 gallons and exhausting to vent V-7, using no controls;

(5) Twelve (12) solvent storage tanks, listed as follows:

(A) Eight (8) tanks, identified as T-A, T-B, T-E, T-F, T-I, T-J, T-K, and T-L, exhausting to stacks A, B, E, F, I, J, K, and L, each with a maximum capacity of 3,000 gallons, using no controls;

(B) Two (2) tanks, identified as T-C and T-D, exhausting to stacks C and D, each with a maximum capacity of 10,000 gallons, using no controls; and

(C) Two (2) tanks, identified as T-G and T-H, exhausting to stacks G and H, each with a maximum capacity of 4,500 gallons, using no controls;

(b) Fifteen (15) premix tanks identified as PM-A through PM-M, PM-O and PM-P, with particulate emissions controlled by a baghouse;

(c) Twenty (20) portable mixers, listed as follows:

(1) Two (2) portable mixers identified as P13 & P14, with particulate emissions controlled by a baghouse;

(2) Twelve (12) portable mixers, identified as P1-P11 and CP1, using no controls;

(3) Five (5) portable mixers, identified as SBB-1, SBB-2, SBB-3, SBB-4 and SBB-5, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput for each mixer of ninety-eight and four-tenths pounds per hour (98.4 lb/hr), using no controls; and

(4) One (1) portable mixer, identified as SBB-6, exhausting through stacks S-4, V-1 or V-2, with a maximum throughput of 293.3 pounds per hour, using no controls;

(d) Eight (8) mills, identified as M1-M4 and M6-M9, using no controls;

(e) Forty (40) let down tanks, identified as L1-L18, L20 & L21, and L23-L42, using no controls;

(f) Two (2) clear manufacturing tanks, identified as C1 and C2, using no controls;

(g) One (1) still identified as ST-1, using no controls;

(h) One (1) CB Mills tote washer, identified as CB, using no controls;

(i) One (1) 20 horsepower horizontal bead mill, identified as M10, using no controls;

(f) Seven (7) dispersion mixers, listed as follows:

(1) Two (2) 15 horsepower dispersion mixers, identified as DM-1 and DM-3 with particulate emissions controlled by an existing baghouse, CE-1;

(2) One (1) 25 horsepower dispersion mixer, identified as DM-2, using no controls; and

(3) Four (4) 5 horsepower dispersion mixers, identified as DM-4, DM-5, DM-6 and DM-7, exhausting to wall vents designated V-1 and V-2 and a stack designated S-4, each with a maximum liquid paint input of 100 pounds per hour total, using no controls **(Exempt)**;

(k) One (1) ten liter basket mill, identified as BM-1, using no controls;

(l) One (1) NU-PAK automatic paint filler line, identified as AFL-1, capable of filling either 5 gallon containers or 55 gallon drums with finished paint product, using no controls; and

(m) One (1) Bentone mixing tank, identified as B1, exhausting through a stack identified as S-3, with a maximum throughput of fifteen hundred and twenty pounds per hour (1,520 lb/hr), using no controls.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Two (2) natural gas fired boilers:

(1) One (1) natural gas fired boiler, identified as B1, constructed after June 8, 1972 but before September 21, 1983, with a heat input capacity of ten million British thermal units per hour (10 MMBtu/hr); and

(2) One (1) natural gas fired boiler, identified as B2, constructed before June 8, 1972, with a heat input capacity of one and twenty five hundredths million British thermal

units per hour (1.25 MMBtu/hr);

(b) One (1) Valflex 2.8 blend system, identified as BS-1;

(c) Storage tanks with a capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons;

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(f) Solvent recycling systems with batch capacity less than or equal to 100 gallons;

(g) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

(h) Paved and unpaved roads and parking lots with public access;

(i) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment; and

(j) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) F003-5148-00018, issued on 12/9/1996;

(b) CP 003-8552I-00018, issued on 5/30/1997;

(c) CP 003-8552-00018, issued on 8/4/1997;

(d) F003-8227-00018, issued on 8/18/1997;

(e) F003-8286-00018, issued on 8/18/1997;

(f) F003-8733E-00018, issued on 1/9/1998;

(g) F003-8733-00018, issued on 2/28/1998;

(h) F003-9171-00018, combined on 11/7/1998;

(i) A003-9467-00018, issued on 11/9/1998 ; and

(k) T003-10794-00018, issued on 8/2/1999.

All conditions from previous construction permits were incorporated into this Part 70 permit. This source is an existing FESOP source that has transitioned into the Title V permitting level.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on July 20, 1998. Additional information was received on April 6, 1999, May 7, 1999 and August 10, 1999.

Emission Calculations

See Appendix A, Emissions Calculations (2 pages), and Appendix B, Potential to Emit Hazardous Air Pollutants (5 pages), of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	23.1
PM-10	23.4
SO_2	0.0
VOC	461.3
CO	4.1
NO_x	4.9

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	>127
MEK	>10
Toluene	<10
Glycol ethers	<10
Chromium	<10
Lead	<10
Cobalt	<10
Manganese	<10
MIBK	<10
ethyl benzene	<10
formaldehyde	<10
styrene	<10
methanol	<10

napthalene	<10
ethylene glycol	<10
TOTAL	>137

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs is greater than 100 tons per year; therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of Xylene and MEK are each greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than twenty-five (25) tons per year; therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	79.620
PM-10	67.817
SO_2	0.000
VOC	44.800
CO	0.000
NO_x	0.000
HAP (specify)	not available

*NOTE: These are the actual emissions as of 1995. Since this time, the the source has made operational changes and emission factors have also changed. A more current table of actual emissions from this source was not available.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting limits from past permit decisions, of the significant emission units.

Limited Potential to Emit (tons/year)							
	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Significant Emission Limit	23.1 tons/yr	23.4 tons/yr	0.0 tons/yr	173.3 tons/yr	4.1 tons/yr	4.9 tons/yr	>25 tons/yr
Bentone Mixing Tank (BMT)	8.6 tons/yr	8.6 tons/yr	0.0 tons/yr	<76.7 tons/yr	0.0 tons/yr	0.0 tons/yr	<25 tons/yr

Total Limited Potential to Emit	Not limited	Not limited	Not limited	<250 tons/yr	Not limited	Not limited	<25 tpy (BMT) No other limits

NOTE: Information taken from permits CP8552, F5148 and MSM10794 and current potential to emit calculations.

This existing source is a major stationary source because volatile organic compounds are emitted at a rate greater than 250 tons per year.

NOTE: The source took a limit of less than 10 tons per year for Xylene emissions and the source also took a limit of less than 25 tons per year MEK emissions from the Bentone mixing tank. The source has a limited PTE of less than 25 tons per year for combination of all HAPs.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) Boiler B1 was constructed before June 9, 1989; therefore, the requirements of 40 CFR Part 60 Subpart Dc, Standards of Performance for small Industrial-Commercial-Institutional Steam Generating Units, do not apply. Any modifications or reconstruction to this boiler will cause this unit to be subject to this rule.

All of the storage tanks at the facility have a capacity less than 40 m^3 (equivalent to 10, 567 gallons); therefore, the requirements of 40 CFR Part 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984, do not apply.

There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on July 20, 1998 for the storage tanks at this facility. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive

Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source is a major source as defined in 326 IAC 2-2 (Prevention of Significant Deterioration).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of Volatile Organic Compounds (VOCs). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 New Source Toxics Control

Pursuant to MSM 003-10794-00018, issued on August 2, 1999, the HAP usage for the Bentone mixing tank shall be limited such that its single HAP emissions will be less than 0.833 tons per month and the combination of HAPs is less than 2.083 tons per month; therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 6-2-3 (Particulate Emission Limitations)

The particulate matter (PM) from the two boilers rated less than ten (10) million British thermal units (MMBtu) per hour shall be limited by the following:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}} = \frac{50\ \mu g/m^3 \times 0.67 \times 41\ ft}{76.5 \times 11.25\ MMBtu/hr^{0.75} \times 1^{0.25}}$$

where:

C = Maximum ground level concentration with respect to distance from the point source at the “critical” wind speed for level terrain. This shall equal 50 micrograms [sic.] per cubic meter ($\mu g/m^3$) for a period not to exceed a sixty minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility’s operation permit application, except when some lower capacity is contained in the facility’s operation permit, in which case, the capacity specified in the operation permit shall be

used.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value of 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet. The stack height for multiple stacks is computed with the following equation:

$$h = \frac{[(h_1 * pa_1 * Q) + (h_2 * pa_2 * Q)]}{[(pa_1 * Q) + (pa_2 * Q)]}$$

Where pa = the actual controlled emission rate in lb/MMBtu.

$$h = \frac{[(65*0.0019*11.25)+(17*0.0019*11.25)]}{[(0.0019*11.25)+(0.0019*11.25)]} = 41$$

Pt = 2.9228 lb/MMBtu

Based on this equation, the PM would be limited to 3 lb/MMBtu heat input; however, since B1 was constructed after June 8, 1972 but before September 21, 1983, the PM shall in no case exceed 0.6 lb/MMBtu heat input from this boiler. In addition, since B2 was constructed before June 8, 1972, the PM shall in no case exceed 0.8 lb/MMBtu heat input from this boiler.

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to F 003-5148-00018 issued on December 9, 1996, the particulate matter (PM) from the paint manufacturing process shall not exceed the allowable particulate matter (PM) emission rate of 4.28 pounds per hour at a process weight rate of 0.68 tons per hour.

The baghouse (CE-1) shall be in operation at all times the paint manufacturing process is in operation in order to comply with this limit.

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to CP 003-8552-00018, issued on August 4, 1997, the particulate matter (PM) from the three (3) dispersion mixers (DM1, DM2, and DM3) shall not exceed the allowable particulate matter (PM) emission rate of 2.0 pounds per hour at a process weight rate of 0.44 tons per hour.

The baghouse (CE-1) shall be in operation at all times when the two (2) dispersion mixers (DM1 and DM3) are in operation in order to comply with this limit.

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to MSM 003-10794-00018, issued on August 2, 1999, the particulate matter (PM) from the Bentone mixing tank shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

$$E = 4.10 \times \frac{(13{,}253{,}092)\ [lb/yr]}{2000\ [lb/ton] \times 8760\ [hr/yr]})^{0.67} = 3.40\ lb/hr$$

Allowable emissions for the Bentone mixing tank is 3.40 pounds per hour at a process weight rate

of 0.76 tons per hour.

326 IAC 8-1-6 (BACT)

Pursuant to CP 003-8552-00018, issued on August 4, 1997, and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the paint filler line identified as AFL-1 shall be no VOC control with good operating and preventive maintenance program.

326 IAC 8-1-6 (BACT)

Pursuant to MSM 003-10794-00018, issued on August 2, 1999, this source has taken a limit of less than twenty five (25) tons per year of VOC emitted from the Bentone Mixing tank; therefore, the requirements of 326 IAC 8-1-6 do not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Since the Paint Manufacturing Process uses a baghouse to control PM emissions and the allowable PM emissions are less than ten pounds per hour (10 lb/hr), there are no compliance monitoring requirements applicable to this source.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments but the source has agreed to take a limit of ten (10) tons per year.

(b) See attached calculations for detailed air toxic calculations. (Appendix B, one page)

Conclusion

The operation of this Industrial Coating Manufacturing Facility shall be subject to the conditions of the attached proposed Part 70 Permit No. T003-9966-00018.

Appendix A: Emissions Calculations
Industrial Coating Manufacturing

Company Name: EPS DBA Valspar Coatings
Address City IN Zip: 202 Jacobs Avenue, Fort Wayne, IN 46851
OP: T003-9966-00018
Plt ID: 003-00018
Reviewer: Kimberly Cottrell
Date: August 25, 2000

Annual throughput (pigment) :	1,500,000	gal of pigment
Annual production rate:	6,000,000	gal of coatings
Average pigment density:	3	lb/gal
Average coating density:	10.25	lb/gal
PM emission factor:	20	lb PM/ ton pigment
VOC emission factor:	30	lb VOC/ ton product
Baghouse control efficiency:	99	percent

Potential to emit Calculations:

Uncontrolled PM Emissions = Annual production rate x Average pigment density x PM emission factor

= 1,500,000 gal pigment/yr x (avg density) $\frac{3 \text{ lb/gal}}{2000 \text{ lb/ton}}$ x $\frac{20 \text{ lb PM/ ton pigment}}{2000 \text{ lb/ton}}$

= 23 tons PM/ year **

** A baghouse is used to control PM emissions from this process with 99% control efficiency

Therefore, the controlled PM emissions are:

= 22.5 tons PM/ year x $\frac{(100 - CE)}{100}$ = **0.225 tons PM/ year**

VOC Emissions = Annual production rate x Average coating density x VOC emission factor

= 6,000,000 gal product/yr x (avg density) $\frac{10.25 \text{ lb/gal}}{2000 \text{ lb/ton}}$ x $\frac{30 \text{ lb VOC/ ton product}}{2000 \text{ lb/ton}}$

= **461 tons VOC/ year**

Methodology:

PM = Particulate Matter
VOC = Volatile Organic Compounds
This process fall under SCC numbers 30101415 and 30101450.
PM and VOC emission factors are from AP-42, Chapter 6.4.1 (Paint Manufaturing), Table 6.4-1.
All PTE calculations are based on an operating schedule of 8760 hours per year.
The following parameters were supplied by Valspar:
Average product density = 10 to 10.5 pounds per gallon.
Average pigment density = 3 pounds per gallon.
Average pigment weight = 25 pounds per gallon.

Appendix B: Potential to Emit Hazardous Air Pollutants

HAP totals from storage tanks (calculations performed by Valspar Coatings)

Company Name: EPS DBA Valspar Coatings
Address City IN Zip: 202 Jacobs Avenue, Fort Wayne, IN 46851
OP: T003-9966-00018
Plt ID: 003-00018
Reviewer: Kimberly Cottrell
Date: January 24, 2001

Unit ID	Xylene	Toluene	MEK	Glycol Ethers	Chromium	Lead	Cobalt	Manganese	MIBK	Ethyl Benzene	Formaldehyde	Styrene	Methanol	Napthalene	Ethylene Glycol	Total HAPs
T-C	0.146															0.146
T-D		0.19														0.19
T-H			0.296													0.296
T-I				0.13												0.13
T-J				0.104												0.104
T-K				0.0064												0.0064
T-1	0.108															0.108
T-2	0.108															0.108
T-3	0.108															0.108
T-4	0.092															0.092
T-5	0.106															0.106
T-6	0.062															0.062
T-7	0.05															0.05
T-8	0.06															0.06
T-9	0.018															0.018
T-10	0.03															0.03
T-12	0.008															0.008
T-13	0.008															0.008
T-14	0.008															0.008
T-15	0.025															0.025
T-16	0.025															0.025
T-17	0.025															0.025
T-19	0.0126															0.0126
T-20				0.02												0.02
T-28	0.02															0.02
T-29	0.019															0.019
T-30	0.02															0.02
T-32	0.011															0.011
T-34	0.018															0.018
T-35	0.015															0.015
T-36		0.005														0.005
T-37		0.005														0.005
T-38	0.0126															0.0126
T-39	0.0126															0.0126
T-RS	0.005	0.01														0.015
T-W2	0.0012	0.0024														0.0036
T-W1	0.003	0.006														0.009
PM-A	0.1141	0.0334	0.0311	0.0278	0.004	0.0017	0.0001	0.0001	0.0035	0.0355	0.0006	0.0001		0.0008	0.0003	0.2531

Appendix B: Potential to Emit Hazardous Air Pollutants

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Address City IN Zip: 202 Jacobs Avenue, Fort Wayne, IN 46851
OP: T003-9966-00018
Plt ID: 003-00018
Reviewer: Kimberly Cottrell
Date: January 24, 2001

Unit ID	Xylene	Toluene	MEK	Glycol Ethers	Chromium	Lead	Cobalt	Manganese	MIBK	Ethyl Benzene	Formaldehyde	Styrene	Methanol	Napthalene	Ethylene Glycol	Total HAPs
PM-B	0.1141	0.0334	0.0311	0.0278	0.0004	0.0017	0.0001	0.0001	0.0035	0.0355	0.0006	0.0001		0.0008	0.0003	0.2495
PM-C	0.3499	0.1025	0.0953	0.0852	0.0013	0.0051	0.0004	0.0003	0.0108	0.1088	0.0017	0.0002	0.0001	0.0026	0.001	0.7652
PM-D	0.3499	0.1025	0.0953	0.0852	0.0013	0.0051	0.0004	0.0003	0.0108	0.1088	0.0017	0.0002	0.0001	0.0026	0.001	0.7652
PM-E	0.3499	0.1025	0.0953	0.0852	0.0013	0.0051	0.0004	0.0003	0.0108	0.1088	0.0017	0.0002	0.0001	0.0026	0.001	0.7652
PM-F	0.3499	0.1025	0.0953	0.0852	0.0013	0.0051	0.0004	0.0003	0.0108	0.1088	0.0017	0.0002	0.0001	0.0026	0.001	0.7652
PM-G	0.0901	0.0264	0.0245	0.0219	0.0003	0.0013	0.0001	0.0001	0.0028	0.028	0.0004			0.0007	0.0003	0.1969
PM-H	0.0901	0.0264	0.0245	0.0219	0.0003	0.0013	0.0001	0.0001	0.0028	0.028	0.0004			0.0007	0.0003	0.1969
PM-I	0.2391	0.0701	0.0651	0.0582	0.0009	0.0035	0.0003	0.0002	0.0074	0.0743	0.0012	0.0001	0.0001	0.0018	0.0007	0.523
PM-J	0.2391	0.0701	0.0651	0.0582	0.0009	0.0035	0.0003	0.0002	0.0074	0.0743	0.0012	0.0001	0.0001	0.0018	0.0007	0.523
PM-K	0.5853	0.1715	0.1594	0.1425	0.0022	0.0085	0.0007	0.0005	0.0181	0.182	0.0028	0.0003	0.0002	0.0043	0.0017	1.28
PM-L	0.4778	0.14	0.1301	0.1163	0.0018	0.007	0.0006	0.0004	0.0148	0.1485	0.0023	0.0002	0.0002	0.0035	0.0014	1.0449
PM-M	0.4093	0.12	0.1115	0.0996	0.0015	0.006	0.0005	0.0004	0.0127	0.1272	0.002	0.0002	0.0002	0.003	0.0012	0.8953
PM-O	0.418	0.1225	0.1138	0.1017	0.0016	0.0061	0.0005	0.0004	0.0129	0.1299	0.002	0.0002	0.0002	0.0031	0.0012	0.9141
PM-P	0.4129	0.121	0.1124	0.1005	0.0015	0.006	0.0005	0.0004	0.0128	0.1284	0.002	0.0002	0.0002	0.0031	0.0012	0.9031
P-9	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-10	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-8	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-7	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-6	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-5	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-4	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-3	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-2	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-1	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
M-1	0.1325	0.0388	0.0361	0.0323					0.0041	0.0412	0.0006	0.0001	0.0001	0.001	0.0004	0.2872
M-2	0.1325	0.0388	0.0361	0.0323					0.0041	0.0412	0.0006	0.0001	0.0001	0.001	0.0004	0.2872
M-3	0.1325	0.0388	0.0361	0.0323					0.0041	0.0412	0.0006	0.0001	0.0001	0.001	0.0004	0.2872
M-4	0.1325	0.0388	0.0361	0.0323					0.0041	0.0412	0.0006	0.0001	0.0001	0.001	0.0004	0.2872
M-6	0.0438	0.0128	0.0119	0.0107					0.0014	0.0136	0.0002			0.0003	0.0001	0.0948
M-7	0.0438	0.0128	0.0119	0.0107					0.0014	0.0136	0.0002			0.0003	0.0001	0.0948
M-8	0.0438	0.0128	0.0119	0.0107					0.0014	0.0136	0.0002			0.0003	0.0001	0.0948
L-1	0.0393	0.0115	0.0107	0.0096					0.0012	0.0122	0.0002			0.0003	0.0001	0.0851
L-2	0.0385	0.0113	0.0105	0.0094					0.0012	0.012	0.0002			0.0003	0.0001	0.0835
L-3	0.0385	0.0113	0.0105	0.0094					0.0012	0.012	0.0002			0.0003	0.0001	0.0835
L-4	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789
L-5	0.0393	0.0115	0.0107	0.0096					0.0012	0.0122	0.0002			0.0003	0.0001	0.0851
L-6	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789
L-7	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789

Appendix B: Potential to Emit Hazardous Air Pollutants

HAP totals from storage tanks (calculations performed by Valspar Coatings)

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OP: T003-9966-00018
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Unit ID	Xylene	Toluene	MEK	Glycol Ethers	Chromium	Lead	Cobalt	Manganese	MIBK	Ethyl Benzene	Formaldehyde	Styrene	Methanol	Napthalene	Ethylene Glycol	Total HAPs
L-8	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789
L-9	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789
L-10	0.1923	0.0563	0.0524	0.0468					0.0059	0.0598	0.0009	0.0001	0.0001	0.0014	0.0006	0.4166
L-11	0.0516	0.0151	0.0141	0.0126					0.0016	0.0161	0.0002			0.0004	0.0001	0.1118
L-12	0.0516	0.0151	0.0141	0.0126					0.0016	0.0161	0.0002			0.0004	0.0001	0.1118
L-13	0.0516	0.0151	0.0141	0.0126					0.0016	0.0161	0.0002			0.0004	0.0001	0.1118
L-14	0.0526	0.0154	0.0143	0.0128					0.0016	0.0164	0.0003			0.0004	0.0002	0.114
L-15	0.0526	0.0154	0.0143	0.0128					0.0016	0.0164	0.0003			0.0004	0.0002	0.114
L-16	0.1255	0.0368	0.0342	0.0306					0.0039	0.039	0.0006	0.0001	0.0001	0.0009	0.0004	0.2721
L-17	0.1336	0.0391	0.0364	0.0325					0.0041	0.0415	0.0006	0.0001	0.0001	0.001	0.0004	0.2894
L-18	0.1336	0.0391	0.0364	0.0325					0.0041	0.0415	0.0006	0.0001	0.0001	0.001	0.0004	0.2894
L-19	0.1336	0.0391	0.0364	0.0325					0.0041	0.0415	0.0006	0.0001	0.0001	0.001	0.0004	0.2894
L-20	0.1458	0.0427	0.0397	0.0355					0.0045	0.0453	0.0007	0.0001	0.0001	0.0011	0.0004	0.3159
L-22	0.085	0.0249	0.0232	0.0207					0.0026	0.0264	0.0004			0.0006	0.0002	0.184
L-23	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-24	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-25	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-26	0.0263	0.0077	0.0072	0.0064					0.0008	0.0082	0.0001			0.0002	0.0001	0.057
L-27	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-29	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-28	0.0263	0.0077	0.0072	0.0064					0.0008	0.0082	0.0001			0.0002	0.0001	0.057
L-30	0.0486	0.0142	0.0132	0.0118					0.0015	0.0151	0.0002			0.0004	0.0001	0.1051
L-31	0.0486	0.0142	0.0132	0.0118					0.0015	0.0151	0.0002			0.0004	0.0001	0.1051
L-32	0.0486	0.0142	0.0132	0.0118					0.0015	0.0151	0.0002			0.0004	0.0001	0.1051
L-33	0.0547	0.016	0.0149	0.0133					0.0017	0.017	0.0003			0.0004	0.0002	0.1185
L-34	0.0547	0.016	0.0149	0.0133					0.0017	0.017	0.0003			0.0004	0.0002	0.1185
L-35	0.1255	0.0368	0.0342	0.0306					0.0039	0.039	0.0006	0.0001	0.0001	0.0009	0.0004	0.2721
L-36	0.0567	0.0166	0.0154	0.0138					0.0018	0.0176	0.0003			0.0004	0.0002	0.1228
L-37	0.1235	0.0362	0.0336	0.0301					0.0038	0.0384	0.0006	0.0001		0.0009	0.0004	0.2676
L-38	0.0526	0.0154	0.0143	0.0128					0.0016	0.0164	0.0003			0.0004	0.0002	0.114
L-39	0.243	0.0712	0.0662	0.0591					0.0075	0.0755	0.0012	0.0001	0.0001	0.0018	0.0007	0.5264
L-40	0.1984	0.0581	0.054	0.0483					0.0061	0.0617	0.001	0.0001	0.0001	0.0015	0.0006	0.4299
L-41	0.1336	0.0391	0.0364	0.0325					0.0041	0.0415	0.0006	0.0001	0.0001	0.001	0.0004	0.2894
L-42	0.0891	0.0261	0.0243	0.0217					0.0028	0.0277	0.0004			0.0007	0.0003	0.1931
C-1	0.2308	0.0676	0.0628	0.0562					0.0071	0.0717	0.0011	0.0001	0.0001	0.0017	0.0007	0.4999
C-2	0.4398	0.1289	0.1198	0.107					0.0136	0.1367	0.0021	0.0002	0.0002	0.0033	0.0013	0.9529
Totals	**14.6372**	**4.1735**	**3.9727**	**3.5468**	**0.0376**	**0.134**	**0.0114**	**0.0081**	**0.4173**	**4.1968**	**0.0648**	**0.0061**	**0.0053**	**0.1006**	**0.0392**	**31.3514**

Appendix B: Potential to Emit Hazardous Air Pollutants

HAP totals from storage tanks (calculations performed by Valspar Coatings)

Company Name: EPS DBA Valspar Coatings
Address City IN Zip: 202 Jacobs Avenue, Fort Wayne, IN 46851
OP: T003-9966-00018
Plt ID: 003-00018
Reviewer: Kimberly Cottrell
Date: January 24, 2001

Unit ID	Xylene	Toluene	MEK	Glycol Ethers	Chromium	Lead	Cobalt	Manganese	MIBK	Ethyl Benzene	Formaldehyde	Styrene	Methanol	Napthalene	Ethylene Glycol	Total HAPs
T-C	0.146															0.146
T-D		0.19														0.19
T-H			0.296													0.296
T-I				0.13												0.13
T-J				0.104												0.104
T-K				0.0064												0.0064
T-1	0.108															0.108
T-2	0.108															0.108
T-3	0.108															0.108
T-4	0.092															0.092
T-5	0.106															0.106
T-6	0.062															0.062
T-7	0.05															0.05
T-8	0.06															0.06
T-9	0.018															0.018
T-10	0.03															0.03
T-12	0.008															0.008
T-13	0.008															0.008
T-14	0.008															0.008
T-15	0.025															0.025
T-16	0.025															0.025
T-17	0.025															0.025
T-19	0.0126															0.0126
T-20				0.02												0.02
T-28	0.02															0.02
T-29	0.019															0.019
T-30	0.02															0.02
T-32	0.011															0.011
T-34	0.018															0.018
T-35	0.015															0.015
T-36		0.005														0.005
T-37		0.005														0.005
T-38	0.0126															0.0126
T-39	0.0126															0.0126
T-RS	0.005	0.01														0.015
T-W2	0.0012	0.0024														0.0036
T-W1	0.003	0.006														0.009
PM-A	0.1141	0.0334	0.0311	0.0278	0.004	0.0017	0.0001	0.0001	0.0035	0.0355	0.0006	0.0001		0.0008	0.0003	0.2531

Appendix B: Potential to Emit Hazardous Air Pollutants

HAP totals from storage tanks (calculations performed by Valspar Coatings)

Company Name: EPS DBA Valspar Coatings
Address City IN Zip: 202 Jacobs Avenue, Fort Wayne, IN 46851
OP: T003-9966-00018
Plt ID: 003-00018
Reviewer: Kimberly Cottrell
Date: January 24, 2001

Unit ID	Xylene	Toluene	MEK	Glycol Ethers	Chromium	Lead	Cobalt	Manganese	MIBK	Ethyl Benzene	Formaldehyde	Styrene	Methanol	Napthalene	Ethylene Glycol	Total HAPs
PM-B	0.1141	0.0334	0.0311	0.0278	0.0004	0.0017	0.0001	0.0001	0.0035	0.0355	0.0006	0.0001		0.0008	0.0003	0.2495
PM-C	0.3499	0.1025	0.0953	0.0852	0.0013	0.0051	0.0004	0.0003	0.0108	0.1088	0.0017	0.0002	0.0001	0.0026	0.001	0.7652
PM-D	0.3499	0.1025	0.0953	0.0852	0.0013	0.0051	0.0004	0.0003	0.0108	0.1088	0.0017	0.0002	0.0001	0.0026	0.001	0.7652
PM-E	0.3499	0.1025	0.0953	0.0852	0.0013	0.0051	0.0004	0.0003	0.0108	0.1088	0.0017	0.0002	0.0001	0.0026	0.001	0.7652
PM-F	0.3499	0.1025	0.0953	0.0852	0.0013	0.0051	0.0004	0.0003	0.0108	0.1088	0.0017	0.0002	0.0001	0.0026	0.001	0.7652
PM-G	0.0901	0.0264	0.0245	0.0219	0.0003	0.0013	0.0001	0.0001	0.0028	0.028	0.0004			0.0007	0.0003	0.1969
PM-H	0.0901	0.0264	0.0245	0.0219	0.0003	0.0013	0.0001	0.0001	0.0028	0.028	0.0004			0.0007	0.0003	0.1969
PM-I	0.2391	0.0701	0.0651	0.0582	0.0009	0.0035	0.0003	0.0002	0.0074	0.0743	0.0012	0.0001	0.0001	0.0018	0.0007	0.523
PM-J	0.2391	0.0701	0.0651	0.0582	0.0009	0.0035	0.0003	0.0002	0.0074	0.0743	0.0012	0.0001	0.0001	0.0018	0.0007	0.523
PM-K	0.5853	0.1715	0.1594	0.1425	0.0022	0.0085	0.0007	0.0005	0.0181	0.182	0.0028	0.0003	0.0002	0.0043	0.0017	1.28
PM-L	0.4778	0.14	0.1301	0.1163	0.0018	0.007	0.0006	0.0004	0.0148	0.1485	0.0023	0.0002	0.0002	0.0035	0.0014	1.0449
PM-M	0.4093	0.12	0.1115	0.0996	0.0015	0.006	0.0005	0.0004	0.0127	0.1272	0.002	0.0002	0.0002	0.003	0.0012	0.8953
PM-O	0.418	0.1225	0.1138	0.1017	0.0016	0.0061	0.0005	0.0004	0.0129	0.1299	0.002	0.0002	0.0002	0.0031	0.0012	0.9141
PM-P	0.4129	0.121	0.1124	0.1005	0.0015	0.006	0.0005	0.0004	0.0128	0.1284	0.002	0.0002	0.0002	0.0031	0.0012	0.9031
P-9	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-10	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-8	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-7	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-6	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-5	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-4	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-3	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-2	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
P-1	0.459	0.1345	0.125	0.1117	0.0017	0.0067	0.0006	0.0004	0.0142	0.1427	0.0022	0.0002	0.0002	0.0034	0.0013	1.0038
M-1	0.1325	0.0388	0.0361	0.0323					0.0041	0.0412	0.0006	0.0001	0.0001	0.001	0.0004	0.2872
M-2	0.1325	0.0388	0.0361	0.0323					0.0041	0.0412	0.0006	0.0001	0.0001	0.001	0.0004	0.2872
M-3	0.1325	0.0388	0.0361	0.0323					0.0041	0.0412	0.0006	0.0001	0.0001	0.001	0.0004	0.2872
M-4	0.1325	0.0388	0.0361	0.0323					0.0041	0.0412	0.0006	0.0001	0.0001	0.001	0.0004	0.2872
M-6	0.0438	0.0128	0.0119	0.0107					0.0014	0.0136	0.0002			0.0003	0.0001	0.0948
M-7	0.0438	0.0128	0.0119	0.0107					0.0014	0.0136	0.0002			0.0003	0.0001	0.0948
M-8	0.0438	0.0128	0.0119	0.0107					0.0014	0.0136	0.0002			0.0003	0.0001	0.0948
L-1	0.0393	0.0115	0.0107	0.0096					0.0012	0.0122	0.0002			0.0003	0.0001	0.0851
L-2	0.0385	0.0113	0.0105	0.0094					0.0012	0.012	0.0002			0.0003	0.0001	0.0835
L-3	0.0385	0.0113	0.0105	0.0094					0.0012	0.012	0.0002			0.0003	0.0001	0.0835
L-4	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789
L-5	0.0393	0.0115	0.0107	0.0096					0.0012	0.0122	0.0002			0.0003	0.0001	0.0851
L-6	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789
L-7	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789

Appendix B: Potential to Emit Hazardous Air Pollutants

HAP totals from storage tanks (calculations performed by Valspar Coatings)

Company Name: EPS DBA Valspar Coatings
Address City IN Zip: 202 Jacobs Avenue, Fort Wayne, IN 46851
OP: T003-9966-00018
Plt ID: 003-00018
Reviewer: Kimberly Cottrell
Date: January 24, 2001

Unit ID	Xylene	Toluene	MEK	Glycol Ethers	Chromium	Lead	Cobalt	Manganese	MIBK	Ethyl Benzene	Formaldehyde	Styrene	Methanol	Napthalene	Ethylene Glycol	Total HAPs
L-8	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789
L-9	0.0364	0.0107	0.0099	0.0089					0.0011	0.0113	0.0002			0.0003	0.0001	0.0789
L-10	0.1923	0.0563	0.0524	0.0468					0.0059	0.0598	0.0009	0.0001	0.0001	0.0014	0.0006	0.4166
L-11	0.0516	0.0151	0.0141	0.0126					0.0016	0.0161	0.0002			0.0004	0.0001	0.1118
L-12	0.0516	0.0151	0.0141	0.0126					0.0016	0.0161	0.0002			0.0004	0.0001	0.1118
L-13	0.0516	0.0151	0.0141	0.0126					0.0016	0.0161	0.0002			0.0004	0.0001	0.1118
L-14	0.0526	0.0154	0.0143	0.0128					0.0016	0.0164	0.0003			0.0004	0.0002	0.114
L-15	0.0526	0.0154	0.0143	0.0128					0.0016	0.0164	0.0003			0.0004	0.0002	0.114
L-16	0.1255	0.0368	0.0342	0.0306					0.0039	0.039	0.0006	0.0001	0.0001	0.0009	0.0004	0.2721
L-17	0.1336	0.0391	0.0364	0.0325					0.0041	0.0415	0.0006	0.0001	0.0001	0.001	0.0004	0.2894
L-18	0.1336	0.0391	0.0364	0.0325					0.0041	0.0415	0.0006	0.0001	0.0001	0.001	0.0004	0.2894
L-19	0.1336	0.0391	0.0364	0.0325					0.0041	0.0415	0.0006	0.0001	0.0001	0.001	0.0004	0.2894
L-20	0.1458	0.0427	0.0397	0.0355					0.0045	0.0453	0.0007	0.0001	0.0001	0.0011	0.0004	0.3159
L-22	0.085	0.0249	0.0232	0.0207					0.0026	0.0264	0.0004			0.0006	0.0002	0.184
L-23	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-24	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-25	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-26	0.0263	0.0077	0.0072	0.0064					0.0008	0.0082	0.0001			0.0002	0.0001	0.057
L-27	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-29	0.0223	0.0065	0.0061	0.0054					0.0007	0.0069	0.0001			0.0002	0.0001	0.0483
L-28	0.0263	0.0077	0.0072	0.0064					0.0008	0.0082	0.0001			0.0002	0.0001	0.057
L-30	0.0486	0.0142	0.0132	0.0118					0.0015	0.0151	0.0002			0.0004	0.0001	0.1051
L-31	0.0486	0.0142	0.0132	0.0118					0.0015	0.0151	0.0002			0.0004	0.0001	0.1051
L-32	0.0486	0.0142	0.0132	0.0118					0.0015	0.0151	0.0002			0.0004	0.0001	0.1051
L-33	0.0547	0.016	0.0149	0.0133					0.0017	0.017	0.0003			0.0004	0.0002	0.1185
L-34	0.0547	0.016	0.0149	0.0133					0.0017	0.017	0.0003			0.0004	0.0002	0.1185
L-35	0.1255	0.0368	0.0342	0.0306					0.0039	0.039	0.0006	0.0001	0.0001	0.0009	0.0004	0.2721
L-36	0.0567	0.0166	0.0154	0.0138					0.0018	0.0176	0.0003			0.0004	0.0002	0.1228
L-37	0.1235	0.0362	0.0336	0.0301					0.0038	0.0384	0.0006	0.0001		0.0009	0.0004	0.2676
L-38	0.0526	0.0154	0.0143	0.0128					0.0016	0.0164	0.0003			0.0004	0.0002	0.114
L-39	0.243	0.0712	0.0662	0.0591					0.0075	0.0755	0.0012	0.0001	0.0001	0.0018	0.0007	0.5264
L-40	0.1984	0.0581	0.054	0.0483					0.0061	0.0617	0.001	0.0001	0.0001	0.0015	0.0006	0.4299
L-41	0.1336	0.0391	0.0364	0.0325					0.0041	0.0415	0.0006	0.0001	0.0001	0.001	0.0004	0.2894
L-42	0.0891	0.0261	0.0243	0.0217					0.0028	0.0277	0.0004			0.0007	0.0003	0.1931
C-1	0.2308	0.0676	0.0628	0.0562					0.0071	0.0717	0.0011	0.0001	0.0001	0.0017	0.0007	0.4999
C-2	0.4398	0.1289	0.1198	0.107					0.0136	0.1367	0.0021	0.0002	0.0002	0.0033	0.0013	0.9529
Totals	**14.6372**	**4.1735**	**3.9727**	**3.5468**	**0.0376**	**0.134**	**0.0114**	**0.0081**	**0.4173**	**4.1968**	**0.0648**	**0.0061**	**0.0053**	**0.1006**	**0.0392**	**31.3514**

Appendix B: Potential to Emit Hazardous Air Pollutants

Solvent Evaporation Loss from the Bentone Mixing Tank

Company Name: EPS DBA Valspar Coatings
Address City IN Zip: 202 Jacobs Avenue, Fort Wayne, IN 46851
OP: T003-9966-00018
Plt ID: 003-00018
Reviewer: Kimberly Cottrell
Date: ###############

Annual Xylene Usage:	11,275,872	lbs xylene/yr
Annual MEK Usage:	264,552	lbs MEK/yr
Solvent Evaporation Loss Factor:	2%	HAP emitted/ HAP used

xylene emissions = annual xylene usage x average density of xylene x conversion factor

= 11,275,872 lbs xylene used / year x 0.02 lb HAP emitted / 1 lb HAP used x 1 ton / 2000 pounds

= **112.76** **tons xylene emitted per year**

MEK emissions = annual MEK usage x average density of MEK x conversion factor

= 264,552 lbs MEK used / year x 0.02 lb HAP emitted / 1 lb HAP used x 1 ton / 2000 pounds

= **2.65** **tons MEK emitted per year**

Total HAPs = xylene emissions + MEK emissions

= 112.76 + 2.65

= **115.40** **tons HAP emitted per year**

Methodology:

MEK = Methyl Ethyl Ketone
This process fall under SCC numbers 30101415 and 30101450.
PM and VOC emission factors are from AP-42, Chapter 6.4.1 (Paint Manufaturing), Table 6.4-1.
The annual solvent usage values were supplied by Valspar.

Appendix A: Emissions Calculations

Natural Gas Combustion Only
MM BTU/HR <10
Small Industrial Boilers

Company Name: EPS DBA Valspar Coatings
Address City IN Zip: 202 Jacobs Avenue, Fort Wayne, IN 46851
OP: T003-9966-00018
Plt ID: 003-00018
Reviewer: Kimberly Cottrell
Date: January 24, 2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
11.25	98.55

	Pollutant					
	PM*	**PM10***	**SO2**	**NOx****	**VOC**	**CO**
Emission Factor in lb/MMCF	1.9	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.0936225	0.37449	0.029565	4.9275	0.2710125	4.1391

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology:

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See Appendix B, page 5 for corresponding HAP emissions calculations.